



United States District Court *for the* District of Puerto Rico

FORM A

Plaintiff vs. Defendant(s)	* * * * * *	CIVIL NO. FORECLOSURE OF MORTGAGE
--------------------------------------	----------------------------	---

COMPLAINT

Plaintiff(s), by the undersigned attorney(s) allege(s) as follows:

I. (Jurisdictional allegations)

2. On _____, for value received, signed and delivered to _____ and interest at _____ per annum, to be paid in consecutive monthly _____ installments of _____, the first of which became due on _____ before Notary _____, deed number _____.

3. The plaintiff is at present the owner and holder of said note.

4. For the purpose of securing the payment or the principal of said note, plus the additional sum of \$ _____ for interest, plus the sum of \$ _____ for cost, disbursement and attorney's fees, the debtor executed a mortgage upon the following property: (SEE EXHIBIT ATTACHED)

5. Said mortgage was duly _____ in the Registry of Property of _____ at page _____, volume of _____, Puerto Rico, estate number _____, inscription _____, where it still, at this time, appears in full force.

6. It was expressly stipulated that if any one or more of the installments of the mortgage should become due and not paid, then the whole outstanding balance of the debt would be due and payable.

7. The following installments have become due and have not been paid by the defendant(s) nor by any other party on (their) (his) (her) (its) behalf: installments due for the months of _____ to _____, 19____, both inclusive, in the sum of \$ _____ each, for principal, interest, and escrow deposit.

8. There is still owing to plaintiff the amount of \$ _____ principal, plus interest at _____ % per annum from _____ to date of full payment.

